

Joseph R. Saveri (*pro hac vice*)  
JOSEPH SAVERI LAW FIRM, INC.  
555 Montgomery Street, Suite 1200  
San Francisco, California 94111  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com

Richard A. Koffman (*pro hac vice*)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
1100 New York Ave., N.W., Suite 500, East Tower  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408 4699  
rkoffman@cohenmilstein.com

Eric L. Cramer (*pro hac vice*)  
BERGER & MONTAGUE, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
ecramer@bm.net

*Co-lead Counsel for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, and Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle Kingsbury*  
[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,  
Luis Javier Vazquez, and Kyle Kingsbury, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No. 2:15-cv-01045-RFB-(PAL)

**[PROPOSED] STIPULATED ORDER  
RE: EXTENSION OF DEADLINE FOR  
EXPERT REPORTS**

Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and  
Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”) (Zuffa and Plaintiffs

collectively, “the Parties”) having met and conferred on the issues addressed herein, respectfully submit the following [Proposed] Stipulated Order re: Extension of Deadline for Expert Reports:

WHEREAS, the Court issued the current Discovery Plan and Scheduling Order on October 14, 2016 (ECF No. 311), under which the deadline for Plaintiffs’ opening expert class and merits reports is May 30, 2017, the deadline for Zuffa’s opposing class and merits expert reports is July 24, 2017, and the deadline for Plaintiffs’ rebuttal class and merits expert reports is September 5, 2017; and,

WHEREAS, Plaintiffs have asserted that several motions are currently pending whose outcomes could materially affect Plaintiffs’ experts’ opening reports, including:

- **Plaintiffs’ Motion to Challenge Work Product Designation**, ECF No. 282, filed August 31, 2016;
- **Plaintiffs’ Motion for Extension of Discovery Deadline and Case Management Schedule**, ECF No. 363, filed March 21, 2017;
- **Non-Party Bellator Sport Worldwide, LLC’s Motion to Quash or Modify Subpoenas**, Case No. 2:17-cv-00849-RFB-PAL, filed in the Central District of California on February 22, 2017 and transferred to the District of Nevada on March 17, 2017; and,

WHEREAS, the Court has scheduled a hearing on Plaintiffs’ motion for extension of discovery deadlines (ECF No. 363) and request for status conference (ECF No. 393) for June 1, 2017; and,

WHEREAS, the June 1 hearing would be two days after Plaintiffs’ experts’ opening reports are due; and,

WHEREAS, Plaintiffs have asked the Court to extend the expert reports deadline by at least sixty days (ECF No. 393 at 4); and,

WHEREAS, Zuffa has previously proposed to extend the expert reports deadline by 30 days or the later of the Court’s ruling on Plaintiffs’ Motion to Challenge Work Product

Designation or Plaintiffs' motion to compel log of Dana White's cell phone communications (ECF No. 401 at 1);

WHEREAS, while Plaintiffs believe that the expert and other deadlines should be vacated pending further order of the Court, to avoid the uncertainties and inefficiencies that would result absent an agreement, and without prejudice to Plaintiffs' ability to seek additional time depending upon whether Plaintiffs are able to complete additional fact discovery as agreed by the parties and/or allowed by the Court, Plaintiffs have agreed to the deadlines set forth herein pending further order of the Court at the June 1 status conference; and,

WHEREAS, the Parties, having met and conferred on May 19, 2017, have agreed to the terms set forth in this Proposed Stipulated Order.

NOW THEREFORE, having considered the representations of the Parties, the Court hereby ORDERS:

The deadlines for the Parties' expert reports, including Plaintiffs' opening class and merits expert reports, previously set forth in the Court's Order dated October 14, 2016 (ECF No. 311), are hereby extended as follows:

Plaintiffs' Opening Expert Reports (class and merits)	July 31, 2017 or 30 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397, whichever is later,
Last Day to Depose Experts Concerning Opening Reports	August 31, 2017 or 60 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397, whichever is later
Opposition Expert Reports	September 29, 2017 or 90 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397
Last Day to Depose Opposition Experts	October 30, 2017 or 120 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397
Reply Expert Reports	November 13, 2017 or 134 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397

1 IT IS SO ORDERED.

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3 DATED: \_\_\_\_\_

United States Magistrate Judge Peggy A. Leen

5 DATED: May 19, 2017

\_\_\_\_\_  
/s/ Michael Dell'Angelo

Michael Dell'Angelo

7 Eric L. Cramer (*pro hac vice*)  
8 Michael Dell'Angelo (*pro hac vice*)  
9 Patrick F. Madden (*pro hac vice*)  
BERGER & MONTAGUE, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Telephone: (215) 875-3000/Fax: (215) 875-4604  
ecramer@bm.net  
mdellangelo@bm.net  
pmadden@bm.net

12 JOSEPH SAVERI LAW FIRM, INC.  
13 Joseph R. Saveri (*pro hac vice*)  
14 Joshua P. Davis (*pro hac vice*)  
Matthew Weiler (*pro hac vice*)  
Kevin E. Rayhill (*pro hac vice*)  
555 Montgomery Street, Suite 1210  
San Francisco, California 94111  
Telephone: (415) 500-6800/Fax: (415) 395-9940  
jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
mweiler@saverilawfirm.com  
krayhill@saverilawfirm.com

18 COHEN MILSTEIN SELLERS & TOLL, PLLC  
19 Benjamin D. Brown (*pro hac vice*)  
20 Richard A. Koffman (*pro hac vice*)  
Daniel Silverman (*pro hac vice*)  
1100 New York Ave., N.W., Ste. 500, East Tower  
Washington, DC 20005  
Telephone: (202) 408-4600/Fax: (202) 408 4699  
bbrown@cohenmilstein.com  
rkoffman@cohenmilstein.com  
dsilverman@cohenmilstein.com

24 *Co-Lead Counsel for Individual and Representative*  
*Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch,*  
25 *Brandon Vera, Luis Javier Vazquez, and Kyle*  
*Kingsbury*

26 WOLF RIFKIN SHAPIRO SCHULMAN &  
27 RABKIN, LLP  
Don Springmeyer  
Nevada State Bar No. 1021  
Bradley Schrager  
Nevada State Bar No. 10217

1 Daniel Bravo  
2 Nevada State Bar No. 13078  
3 3556 East Russell Road, Second Floor  
4 Las Vegas, NV 89120  
5 Telephone: (702) 341-5200  
6 Fax: (702) 341-5300

*Liaison Counsel for Individual and Representative  
Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch,  
Brandon Vera, Luis Javier Vazquez, and Kyle  
Kingsbury*

7 WARNER ANGLE HALLAM JACKSON &  
8 FORMANEK PLC

9 Robert C. Maysey (*pro hac vice*)  
10 Jerome K. Elwell (*pro hac vice*)  
11 2555 E. Camelback Road, Suite 800  
12 Phoenix, AZ 85016  
13 Telephone: (602) 264-7101/Fax: (602) 234-0419  
14 rmaysey@warnerangle.com  
15 jelwell@warnerangle.com

12 LAW OFFICE OF FREDERICK S. SCHWARTZ

13 Frederick S. Schwartz (*pro hac vice*)  
14 15303 Ventura Boulevard, #1040  
15 Sherman Oaks, CA 91403  
16 Telephone: (818) 986-2407/Fax: (818) 995-4124  
17 fred@fredschwartzlaw.com

15 SPECTOR ROSEMAN KODROFF &  
16 WILLIS, P.C.

17 Eugene A. Spector (*pro hac vice* pending)  
18 Jeffrey J. Corrigan (*pro hac vice*)  
19 Jay S. Cohen (*pro hac vice*)  
20 William G. Caldes (*pro hac vice*)  
21 1818 Market Street – Suite 2500  
22 Philadelphia, PA 19103  
23 Telephone: (215) 496-0300/Fax: (215) 496-6611  
24 espector@srkw-law.com  
25 jcorrigan@srkw-law.com  
26 jcohen@srkw-law.com  
27 wcaldes@srkw-law.com

*Counsel for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier  
Vazquez, Brandon Vera and Kyle Kingsbury*

1 DATED: May 19, 2017

/s/ Stacey Grigsby

2  
3 WILLIAM A. ISAACSON (*Pro hac vice*)  
(wisaacson@bsfllp.com)  
4 STACEY K. GRIGSBY (*Pro hac vice*)  
(sgrigsby@bsfllp.com)  
5 NICHOLAS WIDNELL (*Pro hac vice*)  
(nwidnell@bsfllp.com)  
6 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, NW  
7 Washington, DC 20005  
Tel: (202) 237-2727; Fax: (202) 237-6131

8 RICHARD J. POCKER #3568  
(rpocker@bsfllp.com)  
9 BOIES SCHILLER FLEXNER LLP  
300 South Fourth Street, Suite 800  
10 Las Vegas, NV 89101  
Tel: (702) 382-7300; Fax: (702) 382-2755

11 DONALD J. CAMPBELL #1216  
(djc@campbellandwilliams.com)  
12 J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
13 CAMPBELL & WILLIAMS  
700 South 7th Street  
14 Las Vegas, Nevada 89101  
Tel: (702) 382-5222; Fax: (702) 382-0540

15 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
16 *Ultimate Fighting Championship and UFC*  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
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